

Northwest Arctic Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

In Reply Refer To:
OSM.B26047

APRIL 08 2026

Don Striker
Regional Director (Acting)
Alaska Regional Office
National Park Service
240 West 5th Ave.
Anchorage, Alaska 99501

Dear Regional Director Striker,

The Northwest Arctic Subsistence Regional Advisory Council (Council) appreciates the opportunity to provide comments on the National Park Service (NPS) Proposed Rule 1024-AE96 (Proposed Rule) that was published on March 10, 2026. The Council held a public meeting in Kotzebue on March 31 – April 1, 2026, during which members received a briefing on the Proposed Rule. The Council respectfully submits the following comments for consideration on this topic.

First and foremost, while the Council appreciates the NPS's attempt to brief the Council on this subject, the Proposed Rule contains numerous changes, and neither the Proposed Rule nor the information the Council received at the meeting was truly informative. Even after the briefing and an extensive question and answer period, the Council is left unsure of exactly what this Proposed Rule will do, or which NPS lands the changes would affect. It did not appear to the Council that NPS staff fully understood the potential impacts of the Proposed Rule, and this lack of understanding by both parties did not help to alleviate concerns and ensure an advantageous outcome for rural subsistence users.

The Council requests the NPS clarify and fully spell out the changes in the Proposed Rule in plain language for the public to easily understand. Furthermore, the Council requests that NPS uses plain language when communication on this Proposed Rule is sent to Tribes to inform them about potential Tribal consultations, so that the Tribes and others affected by these potential changes can meaningfully engage and understand what may change and what is being asked of them.

Additionally, the Council requests the NPS extend the comment period in conjunction with releasing information in plain language, so that federally qualified subsistence users (FQSU) and Tribes across the State understand the proposed actions. Due to the NPS's lack of adequate communication about the Proposed Rule, much more time is needed for the public to understand the proposed changes and provide substantive comments.

Having not received clear information about the Proposed Rule, the Council is concerned about its potential impacts and voted to oppose this rule. The Council is located in the Northwest Arctic Subsistence Region, which contains the Kobuk Valley National Park and Preserve, and a portion of both the Gates of the Arctic National Park and Preserve and the Bering Land Bridge National Preserve. A huge portion of the region is managed by NPS, and FQSUs in the region are highly dependent on these lands for their subsistence needs. From the information that the Council was able to glean from the briefing, the proposed changes have the potential to deeply affect the people that live and rely on these lands.

Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) gives rural residents priority to harvest subsistence resources. Since the State of Alaska cannot manage for this priority, allowing State regulations to be mirrored on NPS lands could undermine this statutory mandate. Mechanisms already exist to allow the alignment of State and Federal regulations where appropriate and when alignment does not conflict with standing NPS policies. The Council is vehemently against any infringement of the rural priority on Federal lands mandated by Title VIII of ANILCA, and oppose any increase of State authority in managing fish and wildlife on NPS lands.

All individuals residing in the Northwest Arctic Region are FQSUs and depend heavily on caribou, particularly those from the Western Arctic Caribou Herd (WACH). There are a significant number of non-federally qualified users (NFQU) who come to this region to hunt this herd, which is contributing to the steady and alarming decline of the WACH population. Subsistence users in this region have proposed considerable reductions to their harvest limits to preserve this herd. FQSUs are looking to other subsistence foods to sustain themselves to allow the WACH population to rebound. However, these efforts will be nullified if NFQU are given the same harvest limit and land access as those that actually live in the region and subsist on NPS lands. At our recent Council meeting, we strongly supported actions to further restrict harvest limits of caribou in the region, for both FQSU and NFQU alike.

The Council discussed increased predator hunting and trapping in conjunction with reducing caribou harvest limits and do support increased opportunities for the take of bear and wolves for both FQSU and NFQU in the region. As the changes that the Proposed Rule is seeking were unclear on this topic, the Council could not support it.

Thank you for considering our comments. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator, Nissa Pilcher, at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,



Thomas Baker
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Northwest Arctic Subsistence Regional Advisory Council
Office of Subsistence Management
Administrative Record